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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ARIELLE FLETCHER,

Plaintiff,

v.

GATEWAY GROUP ONE, BENJAMIN
OKOLI, STATE OF NEW JERSEY,
COUNTY OF ESSEX, CITY OF NEWARK,
CITY OF ELIZABETH, EMERSON
RUSSELL, MAINTENANCE COMPANY
AVIATION, PORT AUTHORITY OF NEW
YORK AND NEW JERSEY

Defendants.

Civil Action No. 2:20-cv-3413

**NOTICE OF MOTION FOR SUMMARY
JUDGMENT IN LIEU OF AN ANSWER**

TO: Joseph Rakofsky, Esq.
INJURY & ACCIDENT LAW RAKOFSKY, LLC
P.O. Box 32250
Newark, New Jersey 07102

PLEASE TAKE NOTICE that on a October 19, 2020, the undersigned, Robert F. Varady, Esq., on behalf of Defendant, City of Elizabeth, shall move before the Honorable Katharine S. Hayden, U.S.D.J., of the United States District Court, District of New Jersey, 50 Walnut Street, Newark, NJ 07101, for an Order granting Summary Judgment in lieu of an Answer and dismissing the Amended Complaint of Plaintiff, Arielle Fletcher, in its entirety, with prejudice.

PLEASE TAKE FURTHER NOTICE Defendants shall rely on the Certification of Robert F. Varady with accompanying exhibits and Brief in support of the motion, being filed simultaneously with this Notice of Motion.

It is respectfully requested that the Court rule upon the moving papers submitted, without requiring appearance of counsel. A proposed form of Order is attached.

LA CORTE, BUNDY, VARADY & KINSELLA

By: s/*Robert F. Varady*
Robert F. Varady, Esq.

DATED: September 24, 2020